

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MICHAEL BUSH; LINDA TAYLOR;
LISA TIERNAN; KATE HENDERSON;
ROBERT EGRI; KATALIN EGRI;
ANITA LOPEZ; MONICA GRANFIELD;
ANN LINSEY HURLEY; IAN SAMPSON;
SUSAN PROVENZANO; and JOSEPH PROVENZANO,
pro se Plaintiffs,

VS.

C.A. NO. 1:21-cv-11794-ADB

LINDA FANTASIA; MARTHA FEENEY-PATTEN;
ANTHONY MARIANO; CATHERINE GALLIGAN;
JEAN JASAITIS BARRY; PATRICK COLLINS;
DAVID ERICKSON; TIMOTHY GODDARD; and
TOWN OF CARLISLE,
Defendants.

DEFENDANTS' MOTION TO STAY DISCOVERY

Defendants, Linda Fantasia, Martha Feeney-Patten, Anthony Mariano, Catherine Galligan, Jean Jasaitis Barry, Patrick Collins, David Erickson, Timothy Goddard and Town of Carlisle, hereby move to stay all discovery in this matter pending the outcome of defendants' Motion to Dismiss plaintiffs' Complaint. (ECF Doc. No. 21). As grounds therefor, the defendants state that good cause exists to temporarily stay discovery in this matter until after this Court has ruled on whether plaintiffs' *pro se* Complaint states claims against defendants upon which relief can be granted. This Court may grant such relief under its inherent powers to stay proceedings for prudential reasons and its authority to issue protective orders under Fed.R.Civ.P. 26(c)(1). Steward Health Care System LLC v. Southcoast Health System, Inc., 2016 WL 11004353, at *2 (D. Mass. June 15, 2016); Channing Bete Co., Inc. v. Greenberg, 2021 WL 4398510, at *2 (D. Mass. Sept. 27, 2021). Defendants submit the enclosed Memorandum of Law and Exhibit 1 thereto in support of this Motion.

WHEREFORE, for good cause shown, this Court should stay all discovery in this matter pending the outcome of defendants' Motion to Dismiss plaintiffs' Complaint.

Respectfully submitted,

The Defendants,

LINDA FANTASIA, MARTHA FEENEY-PATTEN,
ANTHONY MARIANO, CATHERINE GALLIGAN,
JEAN JASAITIS BARRY, PATRICK COLLINS,
DAVID ERICKSON, TIMOTHY GODDARD and
TOWN OF CARLISLE,

By their Attorneys,

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/s/ John J. Davis

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Dated: August 19, 2022

CERTIFICATE OF SERVICE

I hereby certify that the foregoing, filed through the Electronic Case Filing System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that a paper copy shall be served upon those indicated as non-registered participants on August 19, 2022 as follows:

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